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To: Marlene H. Dortch, Secretary
Federal Communications Commission
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Washington, D.C. 20554

By Electronic Submission:

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Commnet of Delaware, L.L.C. (“Commnet-DE”) hereby submits its E911 Interim Report, pursuant to *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 7709, 7771 ¶172 (2005) (“*Order*”).

Carrier Identifying Information:

Carrier Name: Commnet of Delaware, L.L.C. – FRN 0004-6751-53

E911 Compliance Officer: Petr Valkoun
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E911 Implementation Information:

Commnet-DE is operating as a “carriers’ carrier”, *i.e.*, Commnet-DE serves only the customers of other carriers. Thus, Commnet-DE has no subscribers and will not have any subscribers. Based on this premise, Commnet-DE hereby reports as follows:

- Commnet-DE still has not received any Phase I or Phase II requests from any PSAPs in its market. Commnet-DE has obtained and installed all of the equipment and software necessary to meet any Phase I request it may receive from a PSAP, but will have to work with the local exchange carrier (“LEC”) to have a landline installed between the switch and a requesting PSAP for Phase I deployment when the time comes. It could take a LEC as long as 12 or even 18 months to install a new landline in the rural areas where Commnet-DE is operating.

Commnet-DE has no subscribers, thus Commnet-DE does not have the means to fund any Phase I or Phase II implementation and recurring costs via pass-throughs to subscribers. Because Commnet-DE has not yet received any Phase I or Phase II requests, it has not yet explored the availability of any state or local cost recovery programs for E-911 implementation.

- Commnet-DE elected a handset-based solution for Phase II E-911. Commnet-DE is using analog and TDMA technology at all of its cell sites and has added CDMA technology at two of its cell sites, to meet the demands of its roaming customers. Commnet-DE continues to anticipate a significant problem with its Phase II E-911 deployment. There is currently no Phase II-compliant handset-based solution available for TDMA technology, and it appears from all available market information that one will not become available any time in the near future.

Commnet-DE's CDMA overlay at its cell sites will operate off of a switch in Iowa owned and operated by an unaffiliated carrier, pursuant to a written agreement entered into by Commnet-DE and said Iowa carrier. Since Commnet-DE has not received any Phase II requests, it has not moved forward with Phase II on the CDMA level.

- Commnet-DE remains unable to switch to a network-based solution, because it is technically impossible. The only Phase II-compliant network-based solutions available are based on either triangulation techniques -- which can work only when the network is receiving location information on the involved mobile unit from three different cell sites -- or angle of arrival techniques ("AOA") -- which can work only when the network is receiving location information from at least two different cell sites. Commnet-DE's unserved area market is comprised of only remote, rural areas. One of Commnet-DE's cell sites is a stand-alone cell located a great distance from the other two cell sites. The remaining two cell sites are located closer together, but there is little overlap between these two cell sites. Thus, the bulk of Commnet-DE's service area is not susceptible to either triangulation or AOA techniques. Therefore, if Commnet-DE were to implement a network-based Phase II solution, it would never be able to reach the required 95% accuracy level on a system-wide basis, as prescribed by §20.18 of the Commission's rules. As previously reported, Commnet-DE has a request pending with the Commission for a waiver of the Phase II implementation deadlines.
- For the reasons discussed above pertaining to the permanent absence of any available Phase II TDMA handsets and the impossibility of employing a network-based solution, both of which are beyond Commnet-DE's control, Commnet-DE does not anticipate that full Phase II service will be available in its network any time in the near future. Commnet-DE is continuing to monitor the marketplace for new technology that will provide adequate Phase II E-911 service to rural markets.
- With regard to meeting the ultimate implementation date of December 31, 2005, see above.